

– OHSAS 18001: 2007 CLIENT SELF ASSESSMENT CHECKLIST

	OHSAS 18001 - 2007	Implications for Clients	Evidence of where your system complies
4.1 General requirements	<p>The organization shall establish, document, implement, maintain and continually improve an OH&S management system in accordance with the requirements of this OHSAS standard and determine how it will fulfil these requirements.</p> <p>The organization shall define and document the scope of its OH&S management system.</p>	<p>Explanation of how it will fulfil the requirements of OHSAS 18001:2007</p> <p>Scope of OH&S management system required.</p>	
4.2 OH&S Policy	<p>Top management shall define and authorise the organization's OH&S policy and ensure that within the defined scope of its OH&S management system it:</p> <p>a) is appropriate to the nature and scale of the organization's OH&S risks;</p> <p>b) includes a commitment to prevention of injury and ill health and continual improvement in OH&S management and OH&S performance</p> <p>c) includes a commitment to at least comply with applicable legal requirements and with other requirements to which the organization subscribes that relate to its OH&S hazards</p> <p>d) provides the framework for setting and reviewing OH&S objectives,</p> <p>e) is documented, implemented and maintained;</p> <p>f) is communicated to all persons working under the control of the organization with the intent that they are made aware of their individual OH&S obligations;</p> <p>g) is available to interested parties; and</p>	<p>Not just authorised – active definition / involvement in the establishment of policy.</p> <p>Establish a clear link to the scope. The definition of the scope must be accurate.</p> <p>All specific commitments to be included e.g. ill health.</p> <p>Review and change the policy to have a clear commitment within the documented policy as defined within the Standard (a – e).</p> <p>Key requirements being prevention of injury and a commitment to at least comply with legislation and other requirements.</p> <p>a) Must ensure that there policy is appropriate to their scope.</p> <p>b) Policy must demonstrate commitment to injury & ill-health</p> <p>c) The method of OH&S C.I. Performance must be measurable</p> <p>d) The policy must provide a framework for setting objectives</p> <p>Relationship of legal to hazards will have to</p>	

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	<p>h) is reviewed periodically to ensure that it remains relevant and appropriate to the organization.</p>	<p>be demonstrated.</p> <p>Policy review to be triggered by what changes needs to be identified.</p> <p>Review the process for communication of the policy to include all those who are under the control of the organisation (wherever that may be or they are working) including contractors.</p>	
4.3.1 Planning for hazard identification, risk assessment and risk control	<p>The organization shall establish, implement and maintain a procedure(s) for the ongoing hazard identification, risk assessment, and determination of necessary controls.</p> <p>The procedure(s) for hazard identification and risk assessment shall take into account:</p> <p>a) routine and non-routine activities;</p> <p>b) activities of all persons having access to the workplace (including contractors and visitors);</p> <p>c) human behaviour, capabilities and other human factors;</p> <p>d) identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of the organization within the workplace</p> <p>e) hazards created in the vicinity of the workplace by work-related activities under the control of the organization;</p> <p>f) Note It may be more appropriate for such hazards to be assessed as an environmental aspect.</p> <p>g) infrastructure, equipment and materials at the workplace, whether provided by the organization or others;</p>	<p>Prioritisation and documentation - This is now explicit – although good clients are already doing this – methodology needs to be defined.</p> <p>Reiterating the hierarchy of controls- makes the requirement more explicit.</p> <p>The organisation must have a change management process which includes hazard identification and assessment of OHS risks related to the change.</p> <p>Thorough review of all risk assessments to ensure the new clauses are addressed.</p> <p>(c) Explicit requirement to consider behaviour safety & human factors e.g. mentality, personal appropriateness.</p> <p>(d) Consideration of how this links into Emergency Preparedness & particularly the foreseeable (4.4.7)</p> <p>Identification of hazards outside the workplace will need to be identified</p>	

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	<p>h) changes or proposed changes in the organization, its activities, or materials;</p> <p>i) modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes, and activities.</p> <p>j) any applicable legal obligations relating to risk assessment and implementation of necessary controls (see also the Note to 3.12)</p> <p>k) the design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adaptation to human capabilities</p> <p>The organization's methodology for hazard identification and risk assessment shall:</p> <p>a) be defined with respect to its scope, nature and timing to ensure it is proactive rather than reactive; and</p> <p>b) provide for the identification, prioritization and documentation of risks; the application of controls, as appropriate.</p> <p>For the management of change, the organization shall identify the OH&S hazards and OH&S risks associated with changes in the organization, the OH&S management system, or its activities, prior to the introduction of such changes.</p> <p>The organization shall ensure that the results of these assessments are considered when determining controls.</p>	<p>communicated and assessed where applicable, for example meteorological, geological events, neighbours incidents; transportation incidents; external societal actions.</p> <p>(e) Must be aware of foreseeable significant hazards beyond their boundary of their making are assessed</p> <p>(g) Must be able demonstrate a current status quo in regard to risk assessment</p> <p>(h) as (g) must more systemic</p> <p>(j) Against your hazards are their any specific legal obligations and have these been assessed using required RA methodology</p> <p>Risk should be classified in prioritized method & be documented</p> <p>a) Must be able to demonstrate links between Assessments & controls</p> <p>'establish' = process capability, repeatable defined capability.</p>	

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	<p>When determining controls, or considering changes to existing controls, consideration shall be given to reducing the risks according to the following hierarchy:</p> <ul style="list-style-type: none"> a) elimination b) substitution c) engineering controls d) signage/warnings and/or administrative controls e) personal protective equipment. <p>The organization shall document and keep the results of identification of hazards, risk assessments and determined controls up to date.</p> <p>The organization shall ensure that the OH&S risks and determined controls are taken into account when establishing, implementing and maintaining its OH&S management system.</p> <p>NOTE For further guidance on hazard identification, risk assessment and risk control, see OHSAS 18002.</p>		
4.3.2 Legal and other requirements	<p>The organization shall establish, implement and maintain a procedure(s) for identifying and accessing the legal and other OH&S requirements that are applicable to it.</p> <p>The organization shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its OH&S management system.</p>	<p>Need to see visible links with H/S legal framework</p> <p>Duty expanded to persons under Client's control (contractors, visitors etc)</p>	

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	<p>The organization shall keep this information up-to-date. It shall communicate relevant information on legal and other requirements to persons working under the control of the organization, and other relevant interested parties.</p>		
<p>4.3.3 Objectives and programme(s)</p>	<p>The organization shall establish, implement and maintain documented OH&S objectives, at relevant functions and levels within the organization.</p> <p>The objectives shall be measurable, where practicable, and consistent with the OH&S policy, including the commitments to the prevention of injury and ill health, to compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.</p> <p>When establishing and reviewing its objectives, an organization shall take into account the legal requirements and other requirements to which the organization subscribes, and its OH&S risks. It shall also consider its technological options, its financial, operational and business requirements, and the views of relevant interested parties.</p> <p>The organization shall establish, implement and maintain a programme(s) for achieving its objectives. Programme(s) shall include as a minimum</p>	<p>No new requirements of objectives, although more clearly defined, practical.</p> <p>Note the use of the word implement</p> <p>Measurable where possible.</p> <p>Wider context for these Objectives to be linked back to Policy - Focus on Ill-health</p> <p>There is now a defined requirement for adjustment of programmes.</p> <p>Objectives should be related to the policy commitments including compliance with *legal & other requirements and *the prevention of injury & ill health *delivery of Continual improvement</p>	

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	<p>a) designation of responsibility and authority for achieving objectives at relevant functions and levels of the organization, and</p> <p>b) the means and time-frame by which the objectives are to be achieved.</p> <p>The programme(s) shall be reviewed at regular and planned intervals, and adjusted as necessary, to ensure that the objectives are achieved.</p>		
4.3.4 OH&S management programme(s)	4.3.4 is Not in 14001:2004, as it is now merged into clause 4.3.3. The same treatment has been applied here.		
<p>4.4.1 Structure and responsibility</p> <p>(4.4.1 Resources, roles, responsibility, accountability and authority)</p>	<p>Top management shall take ultimate responsibility for OH&S and the OH&S management system.</p> <p>Top management shall demonstrate its commitment by</p> <p>a) ensuring the availability of resources essential to establish, implement, maintain and improve the OH&S management system.</p> <p>NOTE 1 Resources include human resources and specialized skills,</p> <p>b) organizational infrastructure, technology and financial resources.</p> <p>c) defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective OH&S management; roles, responsibilities,</p>	<p>Specific requirement for defined accountability holders to be defined (this new term and needs to be clarified). Accountable person is the person who has been charged by management to undertake the described activities, but may have delegated the responsibility to a subordinate whilst retaining the accountability to top management.</p> <ul style="list-style-type: none"> • Reference to accountabilities. • All persons effected by the organisation's undertakings must be made aware of the designated appointee. <p>Ensure that personnel are aware that they have responsibilities appropriate to their activities at all levels.</p> <p>Requirement for communicating the identity of the top management appointee(s) and their</p>	

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	<p>accountabilities, and authorities shall be documented and communicated</p> <p>The organization shall appoint a member(s) of top management with specific responsibility for OH&S, irrespective of other responsibilities, and with defined roles and authority for:</p> <ul style="list-style-type: none"> a) ensuring that the OH&S management system is established, implemented and maintained in accordance with this OHSAS standard; b) ensuring that reports on the performance of the OH&S management system are presented to top management for review and used as a basis for improvement of the OH&S management system. <p>NOTE 2 The top management appointee (e.g. in a large organization, a Board or executive committee member) may delegate some of their duties to a subordinate management representative(s) while still retaining accountability.</p> <p>The identity of the top management appointee shall be made available to all persons working under the control of the organization.</p> <p>All those with management responsibility shall demonstrate their commitment to the continual improvement of OH&S performance.</p> <p>The organization shall ensure that persons in the workplace take responsibility for aspects of OH&S over which they have control, including adherence to the organization's applicable OH&S requirements.</p>	<p>responsibilities so that they can be contacted.</p> <p>Clear communication needed.</p>	

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<p>4.4.2 Training, awareness and competence</p> <p>(4.4.2 Competence, training and awareness)</p>	<p>The organization shall ensure that any person(s) under its control performing tasks that may impact on OH&S is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records.</p> <p>The organization shall identify training needs associated with its OH&S risks and its OH&S management system. It shall provide training or take other action to meet these needs, evaluate the effectiveness of the training or action taken, and retain associated records.</p> <p>The organization shall establish, implement and maintain a procedure(s) to make persons working under its control aware of</p> <ul style="list-style-type: none"> a) the OH&S consequences, actual or potential, of their work activities, their behaviour, and the OH&S benefits of improved personal performance; b) their roles and responsibilities and importance in achieving conformity to the OH&S policy and procedures and to the requirements of the OH&S management system, including emergency preparedness and response requirements (see 4.4.7); c) the potential consequences of departure from specified procedures. d) Training procedures shall take into account differing levels of: e) responsibility, ability, language skills and literacy; and f) risk. 	<p>Competency needs to be determined and recorded.</p> <p>More explicit in terms of best practice – Training needs analysis (TNA), evaluation of effectiveness of training given</p> <p>Extends to all persons working under its control (contractors, visitors etc)</p> <p>More explicit requirements to be met, need to consider training effectiveness and formalise training records.</p> <p>Human factors more explicit.</p>	

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<p>4.4.3 Consultation and communication</p> <p>(4.4.3 Communication, participation and consultation)</p>	<p>4.4.3.1 Communication</p> <p>With regard to its OH&S hazards and OH&S management system, the organization shall establish, implement and maintain a procedure(s) for</p> <ul style="list-style-type: none"> a) internal communication among the various levels and functions of the organization, b) communication with contractors and other visitors to the workplace c) receiving, documenting and responding to relevant communications from external interested parties. 	<p>Clear and more focussed</p> <p>Explicitly mentions communications with visitors and contractors Contractors communications need to be documented also what happens to the results of the communication</p> <p>Define process for receiving & responding to communications from external interested parties.</p>	

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	<p>4.4.3.2 Participation and consultation</p> <p>The organization shall establish, implement and maintain a procedure(s) for:</p> <p>a) the participation of workers by their :</p> <ul style="list-style-type: none"> • appropriate involvement in hazard identification, risk assessments and determination of controls, • appropriate involvement in incident investigation; • involvement in the development and review of OH&S policies and objectives; • consultation where there are any changes that affect their OH&S; • representation on OH&S matters. <p>Workers shall be informed about their participation arrangements, including who is their representative(s) on OH&S matters.</p> <p>b) consultation with contractors where there are changes that affect their OH&S</p> <p>The organization shall ensure that, when appropriate, relevant external interested parties are consulted about pertinent OH&S issues.</p>	<p>Specific requirements for the involvement and participation of the workforce in</p> <p>Risk Assessment</p> <p>Investigation process</p> <p>Developing Policies & objectives</p> <p>More prescriptive in regard to associates involvement in HIRARC & Investigation</p>	
4.4.4 Documentation	<p>The OH&S management system documentation shall include</p> <ol style="list-style-type: none"> a) the OH&S policy and objectives, b) description of the scope of the OH&S management system, c) description of the main elements of the OH&S management system and their interaction, and reference to related documents, d) documents, including records, required 	<p>More explicit in regard to particular OH&S Documented requirements</p>	

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	<p>by this OHSAS standard, and</p> <p>e) documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risks.</p> <p>NOTE It is important that documentation is proportional to the level of complexity, hazards and risks concerned and is kept to the minimum required for effectiveness and efficiency.</p>		

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4.4.5 Document and data control (4.4.5 Control of documents)	<p>Documents required by the OH&S management system and by this OHSAS standard shall be controlled. Records are a special type of document and shall be controlled in accordance with the requirements given in 4.5.4.</p> <p>The organization shall establish, implement and maintain a procedure(s) to</p> <ul style="list-style-type: none"> a) approve documents for adequacy prior to issue, b) review and update as necessary and re-approve documents, c) ensure that changes and the current revision status of documents are identified, d) ensure that relevant versions of applicable documents are available at points of use, e) ensure that documents remain legible and readily identifiable, f) ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the OH&S management system are identified and their distribution controlled, and g) prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose. 	<p>Now covers documents of external origin.</p>	
4.4.6 Operational control	<p>The organization shall determine those operations and activities that are associated with the identified hazard(s) where the implementation of controls is necessary to manage the OH&S risk(s). This shall include</p>	<p>Includes other visitors.</p> <p>Consider how this refers to the management</p>	

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	<p>the management of change (see 4.3.1)</p> <p>For those operations and activities, the organization shall implement and maintain:</p> <ul style="list-style-type: none"> a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system. b) controls related to purchased goods, equipment and services c) controls related to contractors and other visitors to the workplace d) documented procedures, to cover situations where their absence could lead to deviations from the OH&S policy and the objectives. e) stipulated operating criteria where their absence could lead to deviations from the OH&S policy and objectives 	<p>of change & associated control in the organisation.</p> <p>Link processes to OHSAS systems.</p>	

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4.4.7 Emergency preparedness and response	<p>The organization shall establish, implement and maintain a procedure(s):</p> <ol style="list-style-type: none"> a) to identify the potential for emergency situations, b) to respond to such emergency situations. <p>The organization shall respond to actual emergency situations and prevent or mitigate associated adverse OH&S consequences.</p> <p>In planning its emergency response the organization shall take account of the needs of relevant interested parties, e.g. emergency services and neighbours.</p> <p>The organization shall also periodically test its procedure(s) to respond to emergency situations, where practicable, involving relevant interested parties as appropriate.</p> <p>The organization shall periodically review and, where necessary, revise its emergency preparedness and response procedure(s), in particular, after periodical testing and after the occurrence of emergency situations (see 4.5.3).</p>	<p>Must respond to emergency situations.</p> <p>Consider the needs of external parties in the planning process.</p> <p>Requirement to review results is now explicit.</p> <p>Wider requirement to involve those interested parties in the periodic test activities.</p> <p>More explicit to reference Emergency Services & Neighbours</p> <p>“where practicable” applies to Testing</p>	
4.5.1 Performance measurement and monitoring	<p>The organization shall establish, implement and maintain a procedure(s) to monitor and measure OH&S performance on a regular basis. This procedure(s) shall provide for:</p> <ol style="list-style-type: none"> a) both qualitative and quantitative measures, appropriate to the needs of the organization; b) monitoring of the extent to which the organization’s OH&S objectives are met; c) monitoring the effectiveness of controls 	<p>Inclusion of health as well as safety monitoring.</p> <p>New requirements for the monitoring of controls (health & safety).</p> <p>More explicit to pre-emptive inspection in measuring the effectiveness of controls</p>	

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	<p>(for health as well as for safety)</p> <p>d) proactive measures of performance that monitor conformance with the OH&S programme(s), controls and operational criteria;</p> <p>e) reactive measures of performance that monitor ill health, incidents (including accidents, near-misses, etc.), and other historical evidence of deficient OH&S performance;</p> <p>f) recording of data and results of monitoring and measurement sufficient to facilitate subsequent corrective action and preventive action analysis.</p> <p>If equipment is required to monitor or measure performance, the organization shall establish and maintain procedures for the calibration and maintenance of such equipment, as appropriate. Records of calibration and maintenance activities and results shall be retained.</p>		
4.5.2 Accidents, incidents, non-conformances and corrective and preventive action			
(4.5.2 Evaluation of compliance)	<p>4.5.2.1 Consistent with its commitment to compliance (see 4.2c)), the organization shall establish, implement and maintain a procedure(s) for periodically evaluating compliance with applicable legal requirements (see 4.3.2).</p>	<p>New procedure for periodic evaluation of compliance in line with ISO 14001 requirements.</p> <p>The records of the outputs need to be appropriate to the risks and controls being</p>	

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	<p>The organization shall keep records of the results of the periodic evaluations.</p> <p>Note The frequency of periodic evaluation may vary for differing legal requirements</p>	<p>managed</p>	
	<p>4.5.2.2 The organization shall evaluate compliance with other requirements to which it subscribes (see 4.3.2). The organization may wish to combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1 or to establish a separate procedure(s).</p> <p>The organization shall keep records of the results of the periodic evaluations.</p> <p>Note The frequency of periodic evaluation may vary for differing other requirements to which the organization subscribes</p>	<p>New procedure for periodic evaluation of compliance in line with ISO 14001 requirements.</p> <p>The records of the outputs need to be appropriate to the risks and controls being managed</p> <p>Must now evaluate the compliance with the other requirements</p>	

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<p>4.5.3 — Records and records management</p> <p>(4.5.3 Incident investigation, nonconformity, corrective action and preventive action)</p>	<p>4.5.3.1 Incident investigation</p> <p>The organization shall establish, implement and maintain a procedure(s) to record, investigate and analyze incidents in order to</p> <ul style="list-style-type: none"> a) determine underlying OH&S deficiencies and other factors that may be causing or contributing to the occurrence of incidents. b) identify the need for corrective action c) identify opportunities for preventive action d) identify opportunities for continual improvement e) communicate the results of such investigations <p>The investigations shall be performed in a timely manner.</p> <p>Any identified need for corrective action or opportunities for preventive action shall be dealt with in accordance with the relevant parts of 4.5.3.2.</p> <p>The results of incident investigations shall be documented and maintained.</p>	<p>Focus upon preventive measures relating to maintenance of equipment as fit for purpose not liable to cause explosions etc, think BP & Exxon, Lessons Learnt from previous incidents! Use of incident investigation.</p> <p>Specific reference to determine root cause & assignment of appropriate corrective action</p> <p>Requirement to record and analyse</p> <p>Timely manner – new</p> <p>Procedures to specifically a) – e) for incident management</p>	

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	<p>4.5.3.2 Nonconformity, corrective action and preventive action</p> <p>The organization shall establish, implement and maintain a procedure(s) for dealing with actual and potential nonconformity(ies) and for taking corrective action and preventive action. The procedure(s) shall define requirements for</p> <ul style="list-style-type: none"> a) identifying and correcting nonconformity(ies) and taking action(s) to mitigate their OH&S consequences, b) investigating nonconformity(ies), determining their cause(s) and taking actions in order to avoid their recurrence, c) evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence, d) recording and communicating the results of corrective action(s) and preventive action(s) taken, and e) reviewing the effectiveness of corrective action(s) and preventive action(s) taken. <p>Where the corrective action and preventive action identifies new or changed hazards or the need for new or changed controls, the procedure shall require that the proposed actions shall be taken through a risk assessment prior to implementation.</p> <p>Any corrective action or preventive action taken to eliminate the causes of actual and potential nonconformity(ies) shall be</p>	<p>Procedure to identify and to correct nonconformity then manage nonconformities in line with requirements b) – e)</p>	

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	<p>appropriate to the magnitude of problems and commensurate with the OH&S risk(s) encountered.</p> <p>The organization shall ensure that any necessary changes arising from corrective action and preventive action are made to the OH&S management system documentation.</p>		
<p>4.5.4 Audit</p> <p>(4.5.4 Control of records)</p>	<p>The organization shall establish and maintain records as necessary to demonstrate conformity to the requirements of its OH&S management system and of this OHSAS standard, and the results achieved.</p> <p>The organization shall establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.</p> <p>Records shall be and remain legible, identifiable and traceable.</p>	<p>Ensure necessary records identified retained retrievable legible identifiable & traceable. That they, collectively, demonstrate conformity to the OH&S MS</p>	
<p>4.5.5 Internal audit</p>	<p>The organization shall ensure that internal audits of the OH&S management system are conducted at planned intervals to</p> <p>a) determine whether the OH&S management system</p> <p>1) conforms to planned arrangements for OH&S management including the requirements of this OHSAS standard, and</p> <p>2) has been properly implemented and is maintained, and</p>	<p>Procedures to include competency; requirements & responsibility of the persons undertaking the planning of audits and record retention</p> <p>Procedures to address the determination of the audit criteria, scope, frequency and methods.</p>	

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	<p>3) is effective in meeting the organization's policy and objectives;</p> <p>b) provide information on the results of audits to management.</p> <p>Audit programme(s) shall be planned, established, implemented and maintained by the organization, based on the results of risk assessments of the organization's activities, and the results of previous audits.</p> <p>Audit procedure(s) shall be established, implemented and maintained that address</p> <p>a) the responsibilities, competencies, and requirements for planning and conducting audits, reporting results and retaining associated records,</p> <p>b) the determination of audit criteria, scope, frequency and methods.</p> <p>Selection of auditors and conduct of audits shall ensure objectivity and the impartiality of the audit process.</p>		

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<p>4.6 Management review</p>	<p>Top management shall review the organization's OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews shall include assessing opportunities for improvement and the need for changes to the OH&S management system, including the OH&S policy and OH&S objectives. Records of the management reviews shall be retained.</p> <p>Input to management reviews shall include</p> <ul style="list-style-type: none"> a) results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which the organization subscribes, b) the results of participation and consultation (see 4.4.3) c) relevant communication(s) from external interested parties, including complaints, d) the OH&S performance of the organization, e) the extent to which objectives have been met, f) status of incident investigations, corrective actions and preventive actions, g) follow-up actions from previous management reviews, h) changing circumstances, including developments in legal and other requirements related to OH&S, and i) recommendations for improvement. <p>The outputs from management reviews shall be consistent with the organization's commitment to continual improvement and</p>	<p>Now includes more specific elements to be considered in the review.</p> <p>Clearer output requirements to be met.</p> <p>Requirement for outputs to be made available to consult and communicate with workers contractors and external interested parties.</p>	

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	<p>shall include any decisions and actions related to possible changes</p> <ul style="list-style-type: none"> a) to OH&S performance b) to OH&S policy and objectives c) to resources, and d) to other elements of the OH&S management system. <p>Relevant outputs from management review shall be made available for communication and consultation (see 4.4.3)</p>		